

**DRAFT!!! Talking Point Regarding H<sub>2</sub>S, SO<sub>2</sub> and CO AreaRae Monitoring Results  
January 28, 2015**

1. The H<sub>2</sub>S, CO and SO<sub>2</sub> data was collected using field instruments (AreaRae's) which provided continuous instantaneous values or readings.
2. The original goal for these 3 compounds, like for radiation and VOCs, was to establish baseline values representative of ambient air quality in the area of our monitors prior to construction activities. These baseline values would be used for comparison to values measured during construction to give an indication of whether readings during construction indicated releases as a result of the construction.
3. Another important goal for the preconstruction air monitoring was to optimize the off-site sampling and monitoring plan for the parameters of concern, including these 3 compounds.
4. Due to the short timeline allotted to deploy the original monitoring network, the Region had to utilize the best air monitoring technology available to us that could be set up quickly. We were uncertain whether the available instruments would provide data of sufficient quality for comparison to health based criteria, but did believe that they would meet the monitoring objective of collecting preconstruction baseline data
5. What we have learned with regard to the instruments used to monitor H<sub>2</sub>S, CO and SO<sub>2</sub>
  - a. The recommended calibration methods were not suitable for our purpose.
  - b. The instrument measurements appear to have been periodically biased at times by activities happening near the monitor.
  - c. Because the instruments were running continuously, they needed frequent adjustment, reset or replacement.
  - d. The instrument picked up various sulfur containing compounds and reported them all as H<sub>2</sub>S. (This conclusion is supported by MDNR's experience and monitoring data.)
6. We have concluded that the data collected for these three compounds cannot be used to compare with health based criteria such as the National Ambient Air Quality Standards (NAAQS) or other standards.
7. We have concluded that an accurate numerical baseline for each of these three compounds cannot be determined based on data we collected.
8. We will use our experiences over the past 6 months to optimize the instruments and methodology to be used for these three compounds during any future air monitoring events at the West Lake Landfill site.
9. We have begun collecting information for H<sub>2</sub>S using Radiellos which will collect 14 day average samples to be sent to a laboratory for analyses.

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10. MDNR has employed similar monitoring technology as EPA at their fixed monitoring stations. MDNR has also, however, supplemented their fixed monitoring stations with twice-daily monitoring surveys using highly sensitive instruments for both H<sub>2</sub>S and Benzene. These monitoring surveys consist of taking measurements at fixed points surrounding the perimeter of the Bridgeton/Westlake complex twice a day for comparison to health-based criteria. These monitoring surveys have consistently measured H<sub>2</sub>S concentrations substantially lower than the fixed monitoring stations because the fixed stations are sensitive to other sulfur containing compounds found in landfill gas. MDHSS review of the H<sub>2</sub>S monitoring data collected at the perimeter of the Bridgeton/Westlake complex to date has concluded that there have been no H<sub>2</sub>S concentrations sufficient to cause a public concern.